

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

IN RE:)	Chapter 7 Case
)	
CHRISOPULOS, GEORGE H)	Case No. 08-24793
GOETZ, PATRICIA J)	
)	Hon. BRUCE BLACK (Joliet)
Debtors.)	

NOTICE OF MOTION

TO: Barbara J Dutton, Dutton & Dutton PC, 10325 W Lincoln Highway, Frankfort, IL 60423 (BY ECF)
Megan G Heeg, Ehrmann Gehlbach Badger & Lee, 215 E First St, Suite 100, Dixon, IL 61021 (BY ECF)
Forrest L Ingram, 79 W Monroe St, Suite 900, Chicago, IL 60603 (BY ECF)
William T. Neary, U.S. Trustee, Office of the U. S. Trustee, Region 11, 219 S Dearborn Street,
Room 873, Chicago, IL 60604 (BY ECF)
George H Chrisopulos and Patricia J Goetz, 2384 Bellingham Court, Aurora, IL 60503 (BY MAIL)

PLEASE TAKE NOTICE that on **September 25, 2009**, at the hour of **9:15 a.m.**, or as soon thereafter counsel may be heard, I shall appear before the Honorable BRUCE BLACK, in Room 201 of the Will County Court Annex, 57 North Ottawa Street, Joliet, Illinois 60432, or, in his/her absence, before any other judge who may be sitting in his/her stead, and shall then and there present the **Motion of Trustee to Disburse Compensation and Abandon Minimal Assets**, a copy of which is served upon you.

Respectfully submitted,

DEBORAH K. EBNER, TRUSTEE

By: /s/Deborah K. Ebner
One of Her Attorneys

CERTIFICATION OF SERVICE

I, DEBORAH K. EBNER, an attorney, state and certify that copies of the foregoing Notice and Motion were mailed to the persons indicated above by depositing a copy of this Notice and the Motion to which it refers in a US Mail Box located in the Chicago, Illinois area prior to the hours of 5:00 p.m. this 18th day of August, unless notice issued electronically by the Clerk of the Court, as indicated above.

/s/Deborah K. Ebner

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GEORGE H CHRISOPULOS and PATRICIA J GOETZ))	Case No. 08-24793
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**MOTION OF TRUSTEE TO DISBURSE
COMPENSATION AND ABANDON MINIMAL ASSETS**

Now comes DEBORAH K. EBNER (hereinafter "Ebner") and respectfully represents unto this Honorable Court as follows:

1. That she is duly appointed, qualified and acting Permanent Trustee in Bankruptcy in the above-captioned case.
2. On November 24, 2008, this Court entered its order authorizing Ebner to perform legal service on behalf of Trustee. That order is attached as **Exhibit A**.
3. That is case has pended since September 18, 2008, during which Trustee has been able to collect only \$1,995.80 for creditors. Administration of these minimal funds is unduly burdensome as a result of which Trustee seeks to abandon all funds on deposit to the Debtor, less compensation and expenses generated for the service expended on research and preparation of pleadings and court appearance relating to exemption planning. That time, the aggregate of which is \$1,987.50, is itemized and attached hereto and incorporated herein as **Exhibit B**. Attached as **Exhibit C** is an itemization of \$20.40 in expenses incurred during this administration.

WHEREFORE, for the foregoing reasons, Trustee herein prays for the entry of an Order authorizing her to issue payment to Movant of \$1,987.50 plus \$20.40, respectively and to abandon the balance of funds (if any) to the Debtor, and for such other relief that this Court deems just and proper.

/s/Deborah K. Ebner
DEBORAH K. EBNER, Trustee

Deborah K. Ebner (ARDC No. 61816159)
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Chicago, Illinois 60603
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